



UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

JANE DOE,

Plaintiff,

v.

REALPAGE, INC. a/k/a LEASING DESK  
SCREENING,

Defendant.

Case No.: 3:25-cv-00150

**PLAINTIFF'S MOTION FOR LEAVE  
TO PROCEED UNDER PSEUDONYM  
OR, IN THE ALTERNATIVE, FOR  
ENTRY OF A PROTECTIVE ORDER**

Plaintiff Jane Doe, hereby moves this Court for leave to proceed in pseudonym or, in the alternative, for entry of a limited protective order pursuant to Fed. R. Civ. P. 26(c)(1). In support thereof, Plaintiff relies on the arguments and authorities contained within his contemporaneously filed Memorandum of Law in Support of Plaintiff's Motion for Leave to Proceed Under Pseudonym, as well as the Complaint, ECF No. 1, filed in this action.

Date: February 11, 2025

*/s/ Daniel Cohen*

Daniel Cohen, NY Bar # 5481460  
CONSUMER ATTORNEYS  
68-29 Main Street  
Flushing NY 11367  
T: (718) 770-7901  
F: (718) 715-1750  
E: dcohen@consumerattorneys.com

William M. Kaludis, TBPR# 17433  
SHIELD LAW GROUP  
515 Maryland Way, Suite 911  
Brentwood, TN 37027  
T: (615) 742-8020  
E: bill@shieldlawgroup.com

*Attorneys for Plaintiff  
Jane Doe*